

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

UNITED STATES OF AMERICA

v.

MATTHEW LEE SEPULVEDA

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CRIMINAL NO. 19-CR-2120

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through its Acting United States Attorney for the Southern District of Texas and the undersigned Assistant United States Attorney hereby submits the attached proposed voir dire questions.

Respectfully submitted,

JENNIFER B. LOWERY
ACTING UNITED STATES ATTORNEY

/s/ Sarina Sophia DiPiazza
Sarina Sophia Dipiazza
Assistant United States Attorney
Federal Bar No. 3382571

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Proposed Voir Dire Questions, was on March 8, 2021, filed by ECF and served on defense counsel.

/s/ Sarina Sophia DiPiazza
Sarina Sophia Dipiazza
Assistant United States Attorney
Federal Bar No. 3382571

PROPOSED VOIR DIRE QUESTIONS

1. Have you or any of your acquaintances ever had any experiences with law enforcement (either good or bad) that would influence your ability to sit as a fair and impartial juror?
2. Have you or any of your acquaintances ever had any experiences with the Federal Government (either good or bad) that would influence your ability to sit as a fair and impartial juror in this matter?
3. The Defendant is charged with two counts of deprivation of civil rights.
 - a. Does anyone have any difficulty with the law that makes it a crime to commit these offenses?
 - b. Do you have any personal objection to the laws of the United States that prohibit violations of a person's civil rights?
4. The trial will involve allegations of sexual assault. Will you be able to listen to allegations of this nature and render a fair and impartial verdict in this case?
5. Do you belong to any group or organization that seeks to influence the enforcement or lack of enforcement of any laws of the United States?
6. Do you have any personal or religious objection to sitting in judgment of another person?
7. Is there anything that you have read in newspapers, magazines, or viewed on television regarding civil rights violations, law enforcement, or the Federal Government that would influence your ability to sit as a fair and impartial juror in this case?

8. Would you tend to disbelieve the testimony of a witness because that witness is a law enforcement officer or an individual who is assisting law enforcement officers?

9. Would you tend to disbelieve the testimony of a witness because that witness is an undocumented alien simply due to his status as an undocumented alien?

10. Do you have any negative feelings about law enforcement agencies or the investigations conducted by them, such that you could not render a fair and impartial verdict for both the government and the defense?

11. Do you have any feelings about the United States Government, the criminal justice system or the prosecution of criminal cases that would affect your ability to render a fair and impartial verdict in this case?

12. Do you have any belief, opinion or conscientious concern about the duties or responsibilities involved in the jury service that would affect your ability to serve as a fair and impartial juror, or affect your ability to render a fair and impartial verdict, based on the evidence presented in court and the judge's instructions on the law?

13. If you are selected to sit as a juror on this case, would you be willing and able to render a verdict based solely on the facts and documents in evidence and the law as the Court will give it to you in its instructions, disregarding any other ideas, notions, or beliefs about the law that you may have?

14. Some people, once they make up their minds, are reluctant to change them. Do you believe that you fall into that category?

15. Do you have any medical problem, including eyesight or hearing difficulties, which might make it difficult for you to serve as a juror, or problems that might cause you to be physically uncomfortable and therefore, distract you from what you will hear and see?

16. Is there any reason you can think of that would influence your ability to sit as a fair and impartial juror in this case?

17. Is there any juror that has had a relative or close friend arrested or the subject of an investigation for any criminal offense?

18. Have you or any member of your family had an encounter with a law enforcement officer of any agency, whether local, state or federal, that has left you with negative thoughts or feelings about law enforcement in general?

19. Does anyone have any difficulty promising to follow the law in this case as stated by the court, even if they disagree with the law?

20. Does anyone here feel they have the right to ignore the law as stated by the court and decide a case based on their own belief of what the law should be?